

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

TIMOTHY BOND, Individually and  
on behalf of all others similarly  
situated,

Lead Plaintiff,

and

JEAN-NICOLAS TREMBLAY

Named Plaintiff,

individually and on behalf of all others  
similarly situated,

v.

CLOVER HEALTH INVESTMENTS, CORP.  
f/k/a SOCIAL CAPITAL HEDOSOPHIA  
HOLDINGS CORP. III, VIVEK GARIPALLI,  
ANDREW TOY, JOE WAGNER, AND  
CHAMATH PALIHAPITIYA, and JOE  
WAGNER,

Defendants.

Civil Action No. 3:21-cv-00096-AT-AN

**NOTICE OF UNOPPOSED MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds, the accompanying Declaration of Brian Calandra, the exhibits annexed thereto, all prior papers and proceedings herein, and such additional evidence or argument as may be presented at or before the hearing, Settlement Class Representatives Firas Jabri and Jean-Nicolas Tremblay (“Plaintiffs”), individually and on behalf of all Settlement Class Members, by

and through their undersigned counsel, will respectfully move this Court, before the Honorable Aleta A. Trauger, United States District Judge for the Eastern District of Tennessee, on October 2, 2023, at 3:30 p.m. in Courtroom 6C of the Fred D. Thompson U.S. Courthouse and Federal Building, 719 Church Street, Nashville, TN 37203, for entry of an Order (1) approving the terms and conditions of the proposed Stipulation and Agreement of Settlement, dated May 19, 2023, as fair, reasonable, and adequate for settlement of all claims asserted by the Settlement Class against Defendants; (2) approving the proposed Plan of Allocation as a fair and reasonable method to allocate the Net Settlement Fund among Settlement Class Members, and (3) entering Final Judgment dismissing this Action with prejudice.

Dated: August 28, 2023

Respectfully Submitted,

**POMERANTZ LLP**

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### **CERTIFICATE OF SERVICE**

This is to certify that I have filed the above and foregoing notice of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds on the Court's CM/ECF filing system, which will serve all counsel of record as follows:

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SO CERTIFIED this 28th day of August 2023

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